

PETITION BY IMMIGRATION AND CUSTOMS
ENFORCEMENT DETAINES OF PLYMOUTH
COUNTY CORRECTIONAL FACILITY

AS AT TUESDAY MARCH 31st 2020

WE THE UNDERSIGNED IMMIGRANTS DETAINED
BY IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE)
AT PLYMOUTH COUNTY CORRECTIONAL FACILITY
HAVE PUT TOGETHER THIS PETITION THAT SEEKS
TO ADDRESS

- (a) Our Concerns about our Safety with regards to the Corona Virus (Covid-19) Pandemic.
- (b) Our Recommendations as Part of a Possible Solution to address our Concerns.

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U.S. DISTRICT COURT
DISTRICT OF MASS.

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INTRODUCTION

- (1) Petitioners are currently being held in Federal Immigration Detention of Plymouth County, CORRECTIONAL FACILITY (PCCF) in the state of Massachusetts.
- (2) Sheriff JOHN D. MCDONALD JR is petitioners immediate custodian.
- (3) Petitioners have been held in Immigration detentions for durations ranging from 3 months to 2 years.
- (4) Green petitioners have established:
 - (i) A well founded fear of persecution and torture if they were to be returned to their home countries.
 - (ii) Have established that their united states Spouse or children will suffer severe hardship if they were to be returned to their home countries.
 - (iii) While some petitioners are in the process of establishing a credible fear.

(5) Given Petitioners have their Immigration cases pending before the following Courts.

- (i) Immigration Court;
- (ii) Board of Immigration Appeals (BIA)
- (iii) Courts of High Circuit.

FACIS ALLEGED

(6) That given the outbreak of the deadly Corona Virus (Covid 19) Pandemic which is threatening the lives, health and safety of thousands globally and in the United States of America.

(7) That the devastation in terms of human cost caused by the Corona Virus (Covid 19) Pandemic with the tally constantly rising with approximately 980,000 confirmed cases and almost 4000 people have died of the disease in the United States of America as at Tuesday March 31 2020.

(8) That with regards to the fact that some inmates and employees of the Plymouth County Correctional facility already tested positive for the Corona Virus (Covid 19). BOSTON HERALD as at Saturday 28 March 2020 Page -

Article entitled. Adu . . .

(9) That with the various measures being taken by the Sheriff's office of the Plymouth County Correctional Facility which are deemed not sufficient enough to curb the spread of the virus and further protect the lives, health and safety of petitioners and thus constitutes,

- (i) Continuous lockdown for 24 hours a day which is causing severe psychological problems among which increased anxiety and depression among petitioners
- (ii) And with Correctional officers constantly coming from the outside and who could be thus exposed to the virus; as well as their presence in units with no protective gear (such as Masks).

(10) That with the lack of Covid 19 testing facilities in detention centers and inadequate hygiene and sanitation supplies such as soap, toilet papers, cleaning detergents and sanitizers, facilities could become a spreading ground for the virus.

(11) That in accordance with measures proposed by health experts and various administrative authorities to curb the spread of the Corona Virus (Covid 19) among which social distancing and maintaining a 6 foot distance

(12) That in a single unit in Plymouth County Correctional Facility which houses averagely 100 inmates this makes social distancing practically impossible and certainly

not achievable and consequently makes it impossible to avoid an outbreak.

(93) That in-line with prior mentioned facts petitioners are seriously fearful as they are exposed and at high risk of contracting the Covid 19 virus, which would be consequently fatal for Immigration detainees particularly those with underlying Health conditions such as Asthma, heart related diseases and in others Severe cases of Anxiety and depression.

(94) Thus petitioners strongly belief their lives, health and safety are seriously at risk and cannot be effectively safeguarded due to their continuous detention during this dreadful Corona Virus (Covid 19) Pandemic which is growing exponentially.

(95) Petitioners respectfully request the,

- (i) Department of Homeland Security (DHS)
(Immigration and Customs Enforcement (ICE))
- (ii) Department of Justice
(Immigration Courts)

To utilize other alternatives to the continuous detention of petitioners that can effectively safeguard petitioners Lives, Health and Safety during this Corona Virus Pandemic.

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PRAYER FOR RELIEF AND POSSIBLE RECOMMENDATIONS
Wherefore Petitioners respectfully asks for the
GRANT of the following Relief

EMERGENCY RELEASE OF PETITIONERS TO GUARANTEE
THEIR WELFARE AND SAFETY

That Pursuant to 8 U.S.C. §§ 1226(a) "An Alien may be arrested & detained pending a decision on whether the Alien is to be removed from the United States." Unless the Alien is removed on Criminal or terrorist grounds. The Attorney General may Continue to detain or release Aliens on "Conditional Parole" or "a bond of atleast \$1500".

And thus the Alien may request a bond hearing in the Immigration Courts at any time before a removal order becomes final. 8.C.F.R. §§ 236.7(d)(1).

Thus Petitioners RECOMMEND THE following
That the federal Court should Persuade .

(i) The Immigration Court Judges to fast track the decisions of Petitioners whose Relief decisions are still pending before the Immigration Courts or have then release awaiting their decisions .

(ii) That in accordance with a federal Judge's ruling that Aliens who have established a credible fear and are awaiting final Relief decisions on their cases

Rending before;

- The Board of Immigration Appeals (BIA)

- Courts of High Circuit,

are entitled to a bond hearing to permit them
exit out their decisions out of detention.

(a) Petitioners request the Court to persuade
Immigration and Customs Enforcement to grant
Parole to petitioners awaiting their Appeal
decisions.

(b) Petitioners request the Court to persuade
the Immigration Courts and Immigration and
Customs Enforcement to grant emergency
bonds to petitioners entitled to Bonds to
permit their release from detention while
awaiting their Appeal decisions.

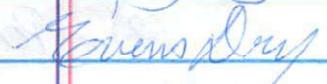
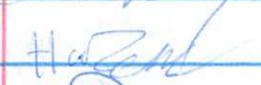
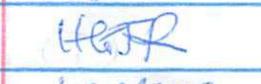
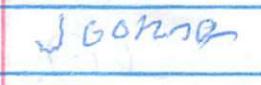
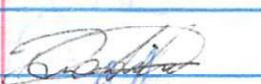
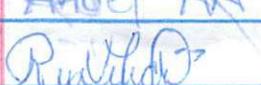
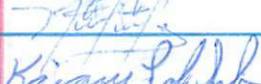
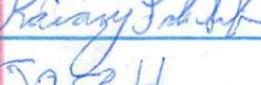
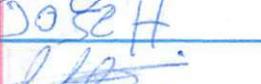
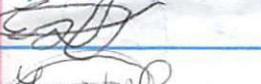
(c) That petitioners in the process of establishing
a credible fear be granted Parole or bond.

Whereas Petitioners belief these emergency actions
be taken promptly to effectuate their release
from detention based on the aforementioned facts
to better safeguard their lives from the
Mortal Corona Virus (Covid-19) Pandemic before
its catastrophic impact is felt on the
detention facility.

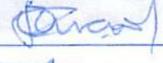
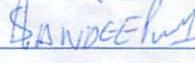
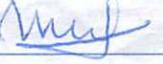
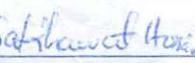
~~PETITIONERS STRONGLY REPRESENT THE INTERESTS~~
 All DETAINED Immigrants at PCCF

NAMES AND SIGNATURES OF PETITIONERS

	NAMES	FACILITY ID NUMBERS	SIGNATURES
(1)	Pedro Wabibi Augusto	78781	Pedro
(2)	Pablo Navarrete	78797	Pablo
(3)	ROCARD- MBUMA	78798	P
(4)	ATAIBONG FOSSEN PAUL	77773	PAUL
(5)	Pedro - Cuba	78323	PEDRO
(6)	J. Alberto Velez Chaves	078803	J. A. Velez Chaves
(7)	Jorge Martinez	78359	Jorge
(8)	Maldonado Mirel	78617	Mirel
(9)	Fausto Dumaguata	78586	Fausto
(10)	José Luis Rodriguez Martinez	78212	José Luis R.
(11)	Marcos F. Chaves Chaves	78210	Chaves
(12)	Fredy Vallejos	78585	Fredy
(13)	Teofilo Viz	78593	Teofilo
(14)	Danilo Gomez Ayala	78356	Danilo
(15)	Manuel B. Mizhirumbay	78265	Manuel
(16)	Ricardo Ramirez	78480	Ricardo
(17)	Miguel Carpio	78569	Miguel
(18)	Galindo Martin	78093	Galindo
(19)	Wilmer Espinal Alvarado	76731	Wilmer
(20)	Jesús Paulino Bellc	78621	Jesús
(21)	Manuel Cela Caguana	78305	Manuel
(22)	Hector J. Elias Pejor Calal	78456	Hector
(23)	Ramón Humberto Sanchez Vásquez	76595	Ramón
24	HENRY. NAVAS. RAMOS	78658	Henry
25	Henoud Rodriguez	78794	Rodriguez
26	Leroy Daley	77629	Leroy Daley

	NAMES	FACILITY ID NUMBERS	SIGNATURES
27	Michael LINGA	77591	
28	EVENS DRY	77005	
29	Hazem Khalil EL Beshtawi	78739	
30	RAFAEL DOS SANTOS RODRIGUES	78583	
31	HERNANDEZ GOMEZ JOSE RENE	78668	
32	VICTOR SILVA SOARES	78653	
33	ROGERIO Pereira da Silva	78620	
34	felipe de lira moreira barros	78335	
35	CARLOS EDUARDO SANTOS	78337	
36	Perez Garcia OSCAR, EDUARDO	75970	
37	Rey Vinicio De León	78450	
38	Luis Zhayng Saeteros	78456	
39	AHMED JEWEL	78433	
40	Mynor Isaacra Socinto Ramirez	78773	
41	Nelson Tisnado	78465	
42	KAIANY FELICIANO DA SILVA	78488	
43	JOSÉ Hernandez	78493	
44	CLEBERSON GUADRELLI	76694	
45	Brayan Arango Sepulveda	76636	
46	ESQUELIN MONTILLA SOTO	78625	
47	Cristian fernando Maza charco.	75966	
48	Roberto castro cortes	78783	
49	Yuli jia xin	77519	
50	Kawalpreet Singh	75649	
51	TAREQ AHMED	76930	
52	Donna Sesanna	78598	

Names and Signatures of Petitioners.

	Names	FACULTY ID NUMBER	SIGNATURES
54	KIBERU AURASHI	77512	
55	Selemin Meles	75696	
56	MOHAMMAD KAMAL AHMED	78435	KAMAL AHMED
57	ABDUR RAHIM	75055	Rahim
58	SLATIN SANU ALBANO (ON)	78800	8
59	Santo Agustin Amador Guerrero	78214	Santo
60	Rainer Mora	78807	Rainer
61	Abay Nizeymana	77370	
62	SINGH SANDEEP	75704	
63	SINGH MANINDER	75692	Maninder
64	Nazim Khan	75049	
65	HOSSEIN SAKHAWAT	77172	

Name

Facility ID
Numbers

SIGNATURES



BRICKTON MASS

03 APR 2020 PM 2 4

Plymouth County Correctional Facility
26 Long Pond Road
Plymouth, MA 02360

Your Full Name / Su Nombre Llevo

ATABONG FOSSEN PAYL

ID#:

Unit & Room #: C3 Room # 422

La unidad y Número del Cuarto

THIS CORRESPONDENCE IS FORWARDED FROM
THE PLYMOUTH COUNTY CORRECTIONAL
FACILITY. THE CONTENTS MAY NOT HAVE BEEN
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SHERIFF'S DEPARTMENT IS NOT RESPONSIBLE
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